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Attorneys for Defendants
Royce Plowman and Madison Smith

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

EDWARD KELLER, JR., individually,
Plaintiff,

vs.

ROYCE PLOWMAN, individually, MADISON
SMITH, individually; DOES I through X,
inclusive; ROE CORPORATIONS XI through
XX, inclusive,
Defendants.

Case No. 2:20-cv-00284-JCM-VCF

**STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINES**

(SECOND REQUEST)

IT IS HEREBY STIPULATED AND AGREED, between the parties and their attorneys of record, that **the current discovery deadlines relating to be extended approximately thirty days (30) days**, pursuant to Local Rule 26-1(b).

I.

DISCOVERY COMPLETED TO DATE

1. The parties have conducted the FRCP 26.1 Early Case Conference.
2. The parties have produced their respective Lists of Witnesses and Documents, and supplements thereto pursuant to FRCP 26(a).
3. Plaintiff has propounded discovery to Defendants.
4. Defendants have propounded discovery to Plaintiff.
5. Plaintiff has responded to Defendants' discovery requests.

7. Defendants have responded to Plaintiff's discovery requests.

8. Defendants have taken the deposition of Plaintiff Edward Keller, Jr. on November 3, 2020.

9. Plaintiff has participated in an Independent Medical Examination on November 1, 2020.

10. Deposition of Defendant Madison Smith.

11. Deposition of Defendant Royce Plowman.

II.

DISCOVERY THAT REMAINS TO BE COMPLETED

1. Deposition(s) of Plaintiff Edward Keller Jr.'s treating physicians.

2. Deposition of other percipient witnesses.

3. Initial expert disclosures.

4. Rebuttal expert disclosures.

5. Depositions of experts.

6. Issuing subpoenas to additional third-parties, including Edward Keller Jr.'s medical providers (if any).

7. Additional written discovery (if necessary).

8. Any remaining discovery the parties deem relevant and necessary as discovery continues.

III.

REASONS THE PARTIES REQUEST TO EXTEND THE DISCOVERY

DEADLINES

The Parties are continuing to discuss settlement options and are looking to avoid the costs of retaining, disclosing, and deposing experts to help facilitate settlement. In addition, the recent holiday season, affected the Parties' ability to have meaningful communication settlement. Therefore, the Parties request additional time to complete discovery. Additionally, Plaintiff's counsel had family related COVID issues that kept him out of the office for an extended period of time.

IV.

CURRENT DISCOVERY DEADLINES AND TRIAL DATE

Last day to amend pleadings or add parties:	December 1, 2020.
Initial expert disclosure:	February 1, 2021.
Rebuttal expert disclosures:	April 2, 2021.
Discovery cut-off:	April 30, 2021.
Dispositive motions:	May 31, 2021.
Joint Pretrial Order:	June 30, 2021.
Trial:	TBD.

V.

PROPOSED DISCOVERY DEADLINES AND TRIAL DATE

Last day to amend pleadings or add parties:	Unchanged.
Initial expert disclosure:	March 1, 2021.
Rebuttal expert disclosures:	May 3, 2021.
Discovery cut-off:	May 31, 2021.
Dispositive motions:	June 30, 2021.
Joint Pretrial Order:	July 30, 2021.
Trial:	TBD.

VI.

CURRENT TRIAL DATE

There is currently no trial date set in this case. Therefore, the requested extension of the aforementioned deadlines **will not affect** the trial in this matter.

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The parties represent this Stipulation is sought in good faith and not interposed for delay or any other improper purpose.

DATED this 14th day of January 2021.

DATED this 14th day of January 2021.

HICKS & BRASIER, PLLC

TYSON & MENDES LLP

/s/ Steven M. Rogers, Esq.

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*Attorneys for Defendants Royce Plowman
and Madison Smith*

ORDER

Based upon the Stipulation of the parties hereto, and with good cause appearing:

IT IS HEREBY ORDERED that the discovery deadlines are extended as follows:

Last day to amend pleadings or add parties: Unchanged.

Initial expert disclosure: March 1, 2021.

Rebuttal expert disclosures:	May 3, 2021.	If dispositive motions are filed, the deadline for filing the joint pretrial order will be suspended until 30 days after decision on the dispositive motions or further court order.
Discovery cut-off:	May 31, 2021.	
Dispositive motions:	June 30, 2021.	
Joint Pretrial Order:	July 30, 2021.	
Trial:	TBD.	

IT IS FURTHER ORDERED, that an amended scheduling order will not be issued.

This Stipulation will take the place of the amended scheduling order.

IT IS SO ORDERED.

DATED this 16th day of January 2021.



UNITED STATES MAGISTRATE JUDGE